

**STATE OF NEW JERSEY
BOARD OF PUBLIC UTILITIES**

**IN THE MATTER OF THE DRAFT PROPOSAL FOR A
VOLUNTARY GREEN POWER CHOICE PROGRAM**

**COMMENTS OF “PV NOW” ON
GPC PROGRAM**

I. INTRODUCTION

“PV Now” appreciates the opportunity to submit these Comments on the proposed Green Power Choice (GPC) Program. We support the intent of the original Recommendation of the Governor’s Renewable Energy Task Force, dated April 24, 2003 that said: *The Task Force Recommends that the BPU working with suppliers, utilities and other stakeholders, develop a statewide program that would offer retail electric customers the option of selecting an energy product or products with a higher level of renewable energy than is required by the RPS. This option should be available to all retail electric customers in the state via a sign-up option on utility bills. Green power sales in this voluntary program must use renewable energy that is not otherwise used to meet a supplier’s RPS requirements and should include full disclosure of the power supply mix utilized by the suppliers participating in the program.*

“PV Now” is an advocacy committee of the national Solar Energy Industry Association (SEIA) and a coalition of five of the world’s leading manufacturers of solar electric

equipment. PV Now members include the following companies: Evergreen Solar, Shell Solar, RWE-Schott Solar, Sharp Solar and PowerLight. PV Now members represent the leading companies in a two billion dollar industry that is growing at 30% per year. The companies represented by PV Now employ thousands of workers in their manufacturing, sales and support operations. The members of PV Now continue to express their strong support for the policy initiatives that have been introduced by the New Jersey Board of Public Utilities. The growing market and supportive state policies have caused companies in the solar industry to commit resources to the state, create jobs in the local solar industry and consider increased manufacturing and assembly facilities in New Jersey.

Our comments on the proposal as submitted by the GPC Task Force will respond particularly to the portion of the Renewable Task Force recommendation that states, “... *develop a statewide program that would offer retail electric customers the option of selecting an energy product or products with a **higher level of renewable energy** than is required by the RPS*”.(emphasis added)

II. THE GPC PROGRAM IN THE CONTEXT OF RENEWABLE ENERGY POLICY IN NEW JERSEY

The members of PV Now stand ready to help the BPU achieve its policy goals of increasing the use of renewable energy in New Jersey to help clean the air, provide a diversified and secure source of local electricity for the state, and promote the development of a high tech industry that will provide quality jobs to the citizens of the

Garden State. PV Now members will continue to work with state policy makers to create a viable public/private partnership to achieve these goals.

In developing the Clean Energy Program, (CEP) the BPU has recognized that electricity supplied in the state should come from diverse sources that include multiple clean technologies. In addition, the CEP recognizes the benefits of encouraging clean on-site distributed generation that can provide reliability and security advantages to the state's consumers. We concur with the Board's approach in both these areas. PV Now believes that the GPC Program should complement and support this approach that the New Jersey BPU has developed. In previous proceedings and rules, the BPU has established the dual goals of supporting local clean energy production (specifically solar electricity) and encouraging local economic development through the promotion of clean energy produced and consumed within the State's borders.

The current proposal being considered by the BPU falls short of its intention to promote the ability of consumers to acquire clean energy on a voluntary basis in a percentage that exceeds the percentage required by the RPS regulations. In fact, there are no requirements that the mix of clean energy sold by Green Choice Providers contain any solar or other clean energy produced within the New Jersey distribution grid. In matter of fact, it is likely that the products sold initially will contain no local content. It is our belief that the consequences of the proposal as written will contravene the intent of the original Renewable Energy Task Force recommendation as well as the policies and rulings established by the Board since that time.

III. PV NOW RECOMMENDATIONS

The proposal itself recognizes that there is likely to be no local content in the products being sold by Green Choice Providers. On page 12 of the Draft Program the following comment is made, “After the first year of the Program, OCE may consider modifying product standards including a minimum percentage of new renewables from within the PJM area, or a more aggressive minimum content standard to improve the environmental externality of the generated electricity such as additional low or no emission wind, solar, biomass or low impact hydro.”

It is the recommendation of PV Now that the product standards be modified *immediately* to require that each product sold in the GPC Program contain a minimum of solar electricity (in the form of solar RECs) that equals or exceeds the percentage requirements established by the Board for the overall RPS Program (e.g. .01%, .017%, etc.). The GPC requirement could incorporate by reference the requirements in the RPS regulations in order to reduce program complexity and maintain ease of program administration. The existence of the solar REC trading system will make the implementation of this product standard a simple process. The inclusion of the solar requirement within the voluntary choice program will mitigate some of the impact of the recent reduction in the overall solar requirement within the RPS Program during 2005 and 2006.

Once the above requirement is established for the initial product content, PV Now suggests that OCE consider increasing the percentage (e.g. from .01%, .017%, etc.) of locally generated no or low emission electricity required in the product mix of the Green

Power Providers after the first year of the Program. Although such an increase has numerous benefits that could be realized immediately if a higher percentage of local zero emission electricity were required today in the product mix, we are cognizant of the Board's desire to get the Program established and to initially limit the green power premium. Consequently, we are recommending the modest first step of matching the solar requirement of the RPS Program in the first year of the GPC Program.

IV. CONCLUSION

The members of "PV Now" are making these comments regarding suggested modifications to the product standards of the Green Power Choice Program within the context of overall support for all efforts to educate consumers as to the consequences of their electricity choices and the provision of mechanisms to give them control and choice of alternatives. We believe the inclusion of local clean energy within the products available in the GPC Program will improve the State's environment and economic outlook. Given the true choice, we believe consumers will support the inclusion of clean New Jersey electricity within all GPC products.

As some of the largest companies in the solar industry, we remain committed to working with the Board as we mutually strive to achieve the energy and economic development goals set forth by the Board. Thank you for the opportunity to provide these comments.

Respectfully submitted,

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